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March 27, 2023

Via Electronic Filing and Federal Express

Hon. Dora L. Irizarry
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE: *Windward Bora LLC v. Stuyvesant Construction Corp.*
Docket No.: 19-cv-7275(DLI)(CLP)

Your Honor:

Pursuant to the March 23, 2023 conference before Your Honor, I am annexing hereto a proposed CLE to comply with the Court's directive. During the conference, Your Honor indicated a single CLE, if it covered both summary judgment and general Federal practice, could be sufficient.

The proposed CLE, in person, on April 28, 2023, titled "Pretrial Practice 2023" is a full day CLE in New York from the Practicing Law Institute ("PLI"), covering both general Federal practice as well as summary judgment under FRCP 56 specifically. A PDF of the course is annexed hereto.

Given the all-day nature of the CLE and that it covers both general Federal practice as well as summary judgment specifically, I ask that the Court approve this CLE and that completion of this CLE will be full compliance with the Court's March 23, 2023 conference Order as to all of the directed CLE requirements.

Thank you for your kind consideration and attention to this matter.

Very truly yours,



Daniel H. Richland, Esq.



Pretrial Practice 2023

1 Location Available

Showing Details for **New York**



[Overview](#) [Credit Details](#) [Schedule & Location](#) [Program Faculty](#)

[Watch On-Demand](#)

Up to 7.5 credits

1-Day Program

See Credit Details Below

Overview

Mark Your Calendar. More Information to Come!

Why You Should Attend

Pretrial practice in federal civil litigation continues to change. As fewer civil cases are tried, the staples of pretrial practice — pleadings, motions to dismiss, discovery, *Daubert* motions, summary judgment, and settlement — have replaced trials as the focus of litigation. What does the changing nature of pretrial practice in litigation mean for your practice? Join our faculty of experienced plaintiffs' and defense attorneys, inside counsel, judges and others as they review what you need to know to succeed at this increasingly important stage of litigation.

What You Will Learn

After completing this session, participants will be able to:

- Plan the litigation
- Investigate the facts and the law
- Plead their case
- Conduct pretrial motions
- Master settlement strategies

Who Should Attend

This program will help attorneys who are not yet experienced litigators become familiar with the ins and outs of pretrial practice.

Special Feature: Earn 6 transitional Skills credits

Program Level: Update

Prerequisites: An interest in pretrial practice.

Advanced Prep: None

Topics

[Litigation](#) · [Practice skills \(Litigation\)](#) · [Pre-trial procedure](#)

Industries

[Legal Services](#)

Register

\$1,940.00

Watch Online

[Watch Online](#)

Apr 28, 2023

9:00 AM EDT

Attend In-Person

New York, NY

Apr 28, 2023

9:00 AM EDT

[RESERVE MY SEAT](#)

Privileged Members attend this program at no cost.

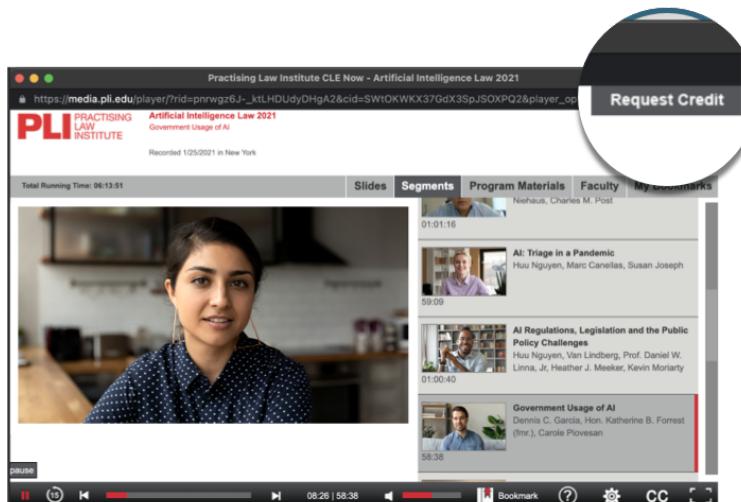


Course materials will be available to attendees prior to the start of the program

Program ID: 359491

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After you've watched an online program, click the Request Credit button on the upper right of the media player to fill out the request credit form.



If you need assistance, contact PLI Customer Service
800.260.4PLI M-F 8AM-6PM EST or info@pli.edu



Credit Details

[Edit Jurisdiction →](#)

CLE for New York

Credit Status: **Approved**

7.5 Total Credits

7.5 Skills

This program is transitional. Both newly admitted and experienced attorneys can earn credit for PLI's transitional live programs.

Scholarships available. [Learn More.](#)

[Read More ▾](#)

[View Credit for All Jurisdictions ▾](#)

Schedule & Location

Apr 28, 2023

9:00 AM EDT

Opening Remarks



9:15 AM EDT

Preparing to File a Lawsuit



10:15 AM EDT

Responding to a Complaint



11:15 AM EDT

Networking Break

11:30 AM EDT

Pretrial Practice: Preliminary Remedies, Summary Judgment Motions and Discovery



12:45 PM EDT

Lunch

1:45 PM EDT

Depositions Dos and Don'ts

2:45 PM EDT

Use of Experts

3:45 PM EDT

Networking Break

4:00 PM EDT

Pretrial Settlement Considerations

5:00 PM EDT

Adjourn[Download Full Schedule](#) **Location****PLI New York**

1177 Avenue of the Americas
Entrance on 45th Street
New York, NY



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Google

Hotel Information **Program Faculty****Chairperson**

David G. Keyko
Pillsbury Winthrop Shaw Pittman LLP

Speakers

	Lauren E. Aguiar Skadden, Arps, Slate, Meagher & Flom LLP		Marla Alhadeff McKinsey & Co.		Jorge Baez NERA Economic Consulting
	Amy Conners White & Case LLP		David A. Crichtlow Katten Muchin Rosenman LLP		Robert S. Fischler Ropes & Gray LLP
	Hon. Holly B. Fitzsimmons United States District Court, District of Connecticut		James C. Francis IV (Ret.) JAMS		Hon. Steven M. Gold (ret.) JAMS
	George G. Gordon Dechert LLP		Hon. Michael A. Hammer United States District Court, District of New Jersey		Anne C. Lefever Pillsbury Winthrop Shaw Pittman LLP
	Hon. Barbara Moses United States District Court, Southern District of New York		Ellen T. Noteware Berger & Montague P.C.		Hon. Henry B. Pitman (Ret.) JAMS Mediator and Arbitrator
	Jacqueline P. Rubin Paul, Weiss, Rifkind, Wharton & Garrison LLP		Steven R. Schindler Schindler Cohen & Hochman LLP		John M. Toriello Holland & Knight LLP
	Kelly Strange Crawford Riker Danzig Scherer Hyland & Peretti LLP				Mark E. Segall JAMS

Program Attorney



Electronic Discovery Nuts & Bolts 2023



Representing the Pro Bono Client: Advocacy Skills for Administrative Hearings 2023



Hot Topics in Electronic Discovery 2023: What Corporate and Outside Counsel Need to Know



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